

From: "JohnStump" <jwstump@cox.net>
To: <btobler@waterboards.ca.gov>, <tmitter@sandiego.gov>
Date: 10/13/2006 11:15:01 AM
Subject: Street Sweeping Proposal - Nasty Little Bits of Evil

Dear Mr. Tobler

RE: Comments on Chollas Creek Toxic Metals and Storm Water Permits of City of San Diego and Other Jurisdictions on Chollas Watershed

Yesterday I submitted comments concerning the City of San Diego's proposal for its renewal of its Storm Water Permit and because it also fully contains surrounds the County of San Diego I believe these comments are linked. Additionally, I understand that you will be reopening and noticing the comment period on the Chollas Creek Toxic Metal TDL Basin Plan Amendment for technical reasons. Please consider today's e-mail along with yesterday's comments. I intend to appear at future meetings of your Board on these subjects.

Notice of All Future Meetings

Please provide me notice of all meetings on these subjects. My address for all notices is as follows: 4133 Poplar Street, City Heights, California 92105. I will pay any reasonable additional costs to meet this request.

Chollas Creek Watershed Meetings

I also suggest that meetings regarding the Chollas Creek Watershed occur in the Chollas Creek Watershed. City Heights has several meeting facilities which are larger and better than your agency facilities which I can assist you in booking. This idea will facilitate community attendance and start saving the environment by eliminating road trips.

Street Sweeping Proposal - Nasty Little Bits of Evil

The City seems to be proposing as an alternate proposal to an more engineered and traditional storm water treatment facility plants demonstration programs of SPECIAL CHOLLAS CREEK STREET SWEEPING PROPOSAL.

The Devil is in the details of this SPECIAL CHOLLAS CREEK STREET SWEEPING PROPOSAL the problem faced in the movie "TIME BANDITS" they had to pick up all the "Nasty Little bits of Evils". In several places in the Chollas Creek watershed the City of San Diego already has signed special Maintenance Assessment Districts (MADs) Special Parking Permit Districts, and other controlled areas to promote regular and frequent street sweeping. The new greater program would have to be measured over this existing base line. Compliance now has been spotty. Investment would be expected to in addition to this effort. A Cost Benefit Analysis of this proposal should be made on this proposal against demonstrated program over its 20 year life for other real programs operated successfully in a comparable climate and watershed. I also suggest that this proposal only be deployed in limited areas and tributaries of this watershed until proven effective. For example, The 38th Street Canyon, of City Heights, by the Copley YMCA may be ideal for proving up this concept because it has all of the elements discussed above. The SPECIAL CHOLLAS CREEK STREET SWEEPING PROPOSAL needs to be proven before it can delay the schedule for implementation for other proven traditional technologies.

NOTICE TRANSIT AGENCIES

My comments yesterday neglected to include the transit agencies that serve the Chollas Creek watershed. As I am sure you are aware, City Heights has some of the highest ridership in the County of San Diego. Please bring the Transit agencies to the table in this matter. One solutions may to increase ridership and remove private automobiles from the roadways. Electric vehicles or trams route around the first mesa may also help.

All the best
John W. Stump III, Esquire
Chollas Creek Restoration, Enhancement, and Conservancy.
4133 Poplar
City Heights, CA 92105

----- Original Message -----

From: JohnStump
To: btobler@waterboards.ca.gov
Cc:
Sent: Thursday, October 12, 2006 3:40 PM
Subject: Fw: Chollas Creek Storm Water Order Metals & Storm Permit

Dear Mr. Tobler

Enclosed are comments on your CEQA Document concerning Toxic Metal Levels in Chollas Creek in the City of San Diego and County of San Diego. and Renewal of the City Storm Water Permit. I represent an association of Chollas Creek Restoration, Enhancement, and Conservancy. Please notice me at 4133 Poplar Street , City Heights, Ca 92105. I request written responses to my comments.

The Chollas Creek Restoration, Enhancement, and Conservancy is a new organization with different orientation single focused purpose - Chollas Creek Community Watershed. Our area of interest is the Chollas Creek watershed , its first mesa from approximately the inwards from the bay inlet and differing zones to water sources in the mountains above. We are a community based and watershed lead organization.

I was disturbed by suggestions by the City of San Diego staff that their obligations to comply could be lessen by demonstrating that Chollas recreation and shellfish fishing and recreation was of no historic value and if it could be eliminated they could be held to a lesser standard. Did I get this right??

Secondly, City Staff seemed to suggest that it was uniquely the Regional Board's responsibility to come up with a plan and a way to Clean up Chollas Creek and to pay for it. It was some how your problem and if you would only tell the City and County what you wanted and what your standards were they would do it. Did I get that right.?

We got the impression that there has not been a wide enough participatory process on this order. Please include us. please send me a copy of your past distribution list. You may have included the agencies that I have suggested in my list to Councilwoman Frye; but please make sure the appropriate policy person is receiving notice of the level of takings that are being proposed by the this compliance order

The body of my remaining comments and questions are contained in the forwarded e-mail to Councilwoman Donna Frye of the City of San Diego..

Please Apply these Comments to both the pending toxic Metal Chollas Creek CEQA Document and Renewal of the City Storm Water Permit.

All the best
Chollas Creek Restoration, Enhancement, and Conservancy.
4133 Poplar
City Heights, CA 92105

----- Original Message -----

From: JohnStump
To: donnafrye@sandiego.gov ; toniatkins@sandiego.gov
Cc: Stephen Hill ; Maryann at fry ; quiroz ; Eric Bowlby ; Ms. Carrol Vaughn ; Jimmy Vee ; Richard Lawrence ; Gabriel Solmer
Sent: Thursday, October 12, 2006 9:43 AM
Subject: Chollas Creek Storm Water Order Hearing

Dear Councilwoman Frye

Thank You for beginning the process at the Legislative Branch yesterday. Your insight and Leadership was helpful. Mrs. Stump send her regards.

As you schedule future hearings and notice future partners to come to the table several issues came to mind. I want to briefly identify these issues out below:

Missing Partners:

CALTRANS:

In the Chollas Watershed we have many freeways that cross it. The Martin Luther King, I-5, I-15, and I-805 freeways dump road wash directly into Chollas creek. My favorite is the drain spout on the I-805 underpass for Home Avenue. CALTRAN's must be part of the clean up.

COUNTY of SAN DIEGO

Most City of San Diego residents forget that there is an incorporated portion of the County in the middle of the City next to Mt. Hope Cemetery and in the Chollas water shed. There is a doughnut hole in watershed. The County controls the Air Pollution Board and Environmental Services and these agencies need to sit with us on this clean up. One of these agencies is located in the watershed. The County should be helping with our clean up efforts.

POLICE, FIRE, PARKS and REC.

These three (3) Departments must review their procedures in the water shed that may be contributing to storm water pollution. Vehicle parking, equipment draining and washing, and animal exercise and relief. Pool maintenance and draining is a concern as are practices concerning fertilizers and grounds maintenance.

MOUNT HOPE, CHOLLAS LAKE, CHOLLAS LAND FILL and OTHER SITES

During yesterday's staff presentation infiltration was dismissed because of soil conditions of vernal pools. What needs further consideration is use of City sites like Mount Hope, storage at Chollas Lake, use at Chollas Land Fill, Colina del Sol golf course, and other City sites. I was intrigued when faced with a Billion dollar price tag; by the San Pasqual brackish water project. We could explore a demonstration project of infiltration of brackish water as has been done in LA for downtown to begin to recover that aquifer.

REDEVELOPMENT AGENCIES & HOUSING & WORKFORCE PARTNERSHIP

At least four redevelopment areas are involved in the Chollas water shed - City Heights, SEDC, Crossroads, and Barrio Logan. CCDC sends low income housing funds to these areas and is supported by its workers and infrastructure. The Housing Commission has more than 30% of its housing in the Chollas watershed. How much of the Housing Commission's housing stock is threatened by the Western study is unknown. These six (3) agencies could contribute to the planning process to a better solution to the water shed. They should also be asked to review their BMP's.

SDG&E , COX CABLE, SBC COMMUNICATIONS

The Chollas watershed has for the most part above ground copper wire utilities on creosol wood poles. The impact of accelerating the schedule of undergrounding these utilities on storm water should be considered. Advancing the schedule for the Chollas community undergrounding would remove thousands of tons of copper and chemicals from Chollas water shed now.

San Diego City Schools, Community Colleges, Private Schools, Churches and Related.

Absent from the staff report was the involvement of the San Diego City School representatives. San Diego City Schools may have more facilities and acres Chollas than the City. They and the others listed above should be at the table

SAN DIEGO MILITARY COMMUNITY

Absent from the staff report was the Military community. Most people are unaware the US military have extensive housing projects in the Mid City and City Heights. One project is over Auburn Creek and several are directly adjacent to the Chollas Creek. The Military needs to be at the table in several roles.

REGIONAL AIRPORT AUTHORITY

Any resident of the Chollas Watershed knows they live under the approach to Lindbergh Field and that it is noisy and jet fuel dirty. Some of that Jet fuel must get into the water. The Airport need to be at the table.

PORT of SAN DIEGO

I was very distressed that the Departments staff was working so hard to get rid of traditional use of Chollas Creek Shell fishing by commercial, recreational and Native American people. We often think of the Port of San Diego as just the Convention Center or Harbor Drive Hotels ; but this is the Port too and they need to get involved and help out. I think that the Port of San Diego should be ask to start funding a demonstration project restore and repair these habitat's now.

I hope that this provides a starting for some additional ideas for your future hearing on Chollas Creek Storm Water Permit and Toxic Metals. Thank you for your commitment to us to bring the community to the table.

All the best
John W. Stump
4133 Poplar
City Heights, Ca 92105

CC: "Julie Benedict" <julie@workforce.org>, "Dr. John Rivera P h D" <jrivera@san-diego.gov>, "Stephen Hill" <SHill@san-diego.gov>, "Cory Briggs" <cory@briggslawcorp.com>, "Malinda Dickenson" <MDickenson@san-diego.gov>, "Gabriel Solmer" <gabe@sdcoastkeeper.org>, "Ms. Carrol Vaughn" <carrolv@sdhc.org>, "Eric Bowlby" <savewetlands@COX.NET>, "quiroz" <quiroz@cox.net>, "Maryann at fry" <mkipczenski@san-diego.gov>, <toniatkins@san-diego.gov>, <donnafray@san-diego.gov>, "Richard Lawrence" <ahcsd@hotmail.com>, "Jimmy Vee" <city_heights_92105@yahoo.com>